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Rockville, MD 20852

**Re: President's Council on Food Safety Strategic Plan  
Docket No. 97N-0074  
64 Fed. Reg. 32788 (June 17, 1999)**

USDA/FSIS Hearing Clerk  
300 12<sup>th</sup> Street, SW, Rm. 102 Cotton Annex  
Washington, DC 20250-3700

**Re: President's Council on Food Safety Strategic Plan  
Docket No. 98-045N  
64 Fed. Reg. 32788 (June 17, 1999)**

Dear Sir or Madam:

The Grocery Manufacturers of America (GMA) welcomes this opportunity to comment on the development of a comprehensive national food safety strategic plan by the President's Council on Food Safety. GMA applauds the Council's solicitation of public participation in this most important and timely process.

We endorse this effort to improve the coordination and communication among the several agencies that work in cooperation with the food industry to ensure that Americans continue to enjoy the safest, most wholesome, and most abundant and affordable food supply in the world. Through the "smart" use of all available resources, and application of consistent, science-based regulation that is harmonized throughout the world, this objective can be achieved.

GMA is the world's largest association of food, beverage and consumer brand companies. With U.S. sales of more than \$450 billion, GMA members employ more than 2.5 million workers in all 50 states. The organization applies legal, scientific, and political expertise from its member companies to vital food, nutrition, and public policy issues affecting the industry. Led by a board of 42 Chief Executive Officers, GMA speaks for food and consumer product manufacturers at the state, federal and international levels on legislative and regulatory issues. The association also leads efforts to increase productivity, efficiency, and growth in the food, beverage and consumer products industry.

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## I. INTRODUCTION AND OVERVIEW

As the President's Council moves forward with the development of a comprehensive strategic plan, it is important to remember that, as a nation, we have already achieved a great deal. The United States enjoys a fundamentally safe food supply in large part because of the highly effective partnership that exists between government agencies with responsibility for food safety and the food industry. Thus, in discussing how we can enhance food safety, we begin with an unparalleled base of knowledge, experience, and achievement.

We also begin with a food safety system that, though perhaps not perfect, is effective, and that system should be enhanced not replaced. The key to the optimum food safety system of the future is a sharper focus, not a change in organizational structure, as some critics of the current system have suggested. Arbitrarily reorganizing the government, tempting as that might sometimes be, will not make our food supply safer; better focusing our limited public and private resources and using them more effectively to address real food safety hazards, on the other hand, can make a difference.

A thoughtful, highly substantive strategic plan is an essential tool in the effort to enhance the performance of our current food safety system. GMA appreciates the careful thought that has gone into the development of the goals and objectives portion of the draft inter-agency plan, outlined in the captioned June 17, 1999 *Federal Register* notice. These goals and objectives represent important building blocks in the creation of a more effective national food safety system and, as a general matter, have the Association's full support.

Before putting into final form the comprehensive strategic plan, however, GMA urges the Council to "take a step back" and consider two important threshold issues. First, is the plan consistent with and does it reflect basic principles essential to any effective food safety system? Second, does the plan capture not only the Council's and the agencies' aspirations for enhanced food safety but does it also provide a practical, concrete roadmap for how to achieve it? A plan that does not satisfactorily address both driving concerns may result in much talk, little action, and no real enhancement to food safety.

## **II. FOUR BASIC PRINCIPLES MUST UNDERLIE ANY EFFECTIVE FOOD SAFETY SYSTEM**

GMA strongly believes that all of our nation's food safety activities -- and the framework within which these activities are managed -- must be based upon four unifying principles. GMA has discussed these principles with the agencies and members of Congress on numerous occasions in the past. They are:

- Research and science: Our food safety system must emphasize research. We must identify and fight the true causes of foodborne illness with the right scientific weapons. Those weapons can only be discovered through laboratory research and practical testing. Food safety research deserves high priority and funding.
- Education: Everyone who handles food from producer to consumer must be educated about their roles in helping to reduce the risk of foodborne illness. Using the Fight BAC Program, classroom education, advertising and other methods, we must teach all Americans how to handle and prepare food safely.
- Adequate staffing and resources: Consumers, and the food industry, are best served by strong food safety agencies -- including the Food and Drug Administration, the U.S. Department of Agriculture, Environmental Protection Agency, and state and local health agencies -- which develop policy based on sound science. Although these agencies already do a good job, better coordination of their functions, allowing each agency to do what it can do best and reducing conflict and duplication, would enhance their effectiveness and efficiency. At the same time, however, they must be afforded the resources that the increasing challenges of a global marketplace demand.
- Better coordination: Better coordination and utilization of government resources requires focusing those resources on real food safety hazards with science-based solutions. This means a shift in emphasis to rely upon the use of modern microbiology and detection technology to identify and address food safety hazards, and away from antiquated labor intensive inspection procedures that can do little more than measure a food's organoleptic characteristics.

A steady focus on, and application of, these principles is critical to the success of the strategic plan and the work of the President's Council generally. Accordingly, GMA urges the Council to ensure that all goals and objectives incorporated in the strategic plan are fully consistent with these principles.

**III. THE STRATEGIC PLAN MUST PROVIDE A PRACTICAL, SUBSTANTIVE ROADMAP FOR THE ENHANCEMENT OF FOOD SAFETY**

Governments are continually confronting the challenge of limited resources and competing priorities. That challenge has never been more acute in the U.S., as the Baby Boomer generation enters retirement. In an era of limited resources and boundless demands, the Council's comprehensive strategic plan must assist the agencies to use the food safety resources they already have in the most effective way possible. In other words, the plan must strive to help the agencies "regulate smart." A document that merely identifies laudable goals, with little regard to their practical implementation, may make us feel good in the short term but will produce few tangible results. In this regard, although the goals as set forth by the Council are certainly appropriate in terms of providing a concrete roadmap for implementation, they are theoretical and skeletal.

Goal #1: Scientific and Technological Food Safety Database

GMA endorses the Council's first goal for the food safety strategic plan. Indeed, it is difficult to imagine how any stakeholder could take issue with the development of a comprehensive scientific and technological food safety database. GMA has consistently described research and science-based assessments of risk as the bedrock of an enhanced food safety system that deserves high priority and full funding.

GMA urges the agencies, however, to structure and implement Goal 1, and the objectives it encompasses, in a concrete, practical way. Before any research is approved or undertaken, those responsible must articulate clearly what they are trying to determine, and how determining it relates to, and will enhance, food safety. In other words, the precise goals of particular research, and what the research can be expected to achieve, must be understood, acknowledged, and justified. Research merely for the sake of research will only deplete scarce resources with little, if any, demonstrable enhancement in food safety. Enhancing food safety requires focusing on real food hazards with science-based solutions.

Goal #2: Improve the Effectiveness of Surveillance, Outbreak Investigation, and Response

GMA also endorses the agencies' second stated goal of improving the effectiveness of foodborne illness surveillance, investigation, and response. Active illness surveillance studies that identify both the number of individuals affected in an outbreak and the sources of those outbreaks should be continued and expanded. The data generated by these studies are indispensable to a science-based regulatory system. This type of information, moreover, can and will spur the development of technologies to decrease the risks of bacterial contamination or prevent it all together.

The Council also correctly observes that improved effectiveness of surveillance, investigation and response requires better coordination among the responsible agencies. GMA has consistently called for improvements in this area. Over the years, the federal food safety system has produced people and institutions that are highly experienced and knowledgeable. Yet, often it seems the agencies fail to devote the right resources to the right problems. And far too often, this is an unfortunate byproduct of competing agency prerogatives.

The draft strategic plan seems sensitive to that shortcoming but does little to facilitate change. Simply calling for better coordination will not make it happen. Rather, the Council, with the input of all stakeholders, should be (1) asking why failures in communication occur among the federal agencies; (2) identifying the substantive areas in which the responsibilities of the agencies overlap; and (3) implementing specific measures to improve communication and eliminate duplication including, where necessary, the transfer and consolidation of responsibilities and associated personnel.

In that regard, GMA applauds the creation of the Foodborne Outbreak Response Coordinating Group (FORCG) as a concrete first step toward improved coordination. GMA urges the Council, however, as part of the strategic plan, to clarify the mission and responsibilities of that Group. Without a clearly defined portfolio, and the tools to carry it out, FORCG too could amount to little more than a "feel good" short-term cosmetic gesture.

Goal #3: Identify and Manage Food Safety Risks through Protective Standards,  
Inspection and Enforcement from Farm to Table

Again, GMA fully supports the Council's third goal of approaching food safety from a farm-to-table perspective. No stage in the farm-to-table supply chain is risk free. Efforts must be made at all stages of food production, distribution, and consumption to identify and control food safety hazards.

Food manufacturers have already invested substantial resources toward this goal, and the industry is committed to continuing its partnership with the government to help our nation's system evolve and keep pace with the product innovations and technological advancements characteristic of the increasingly global marketplace. For example, the HACCP system -- now mandated by the Food Safety and Inspection Service for processing meat and poultry and by FDA in seafood processing -- originated with industry. Other segments of the farm-to-table chain, however, have been far less proactive in their efforts to enhance food safety. It is on these segments of the chain that GMA believes the strategic plan must focus.

Accordingly, GMA urges the President's Council to ask itself (1) are there any "weak links" in the food distribution chain?; (2) what controls, if any, are currently in place at those stages, either as voluntary standards or as regulatory requirements?; (3) are additional controls warranted?; and (4) what relative improvement in food safety are such controls likely to provide? Food manufacturers have long abided by Good Manufacturing Practices for the preparation, packing, and holding of food as well as other voluntary food safety controls. It may well be time to promote adoption of similar types of performance-based controls for growers, distributors, and others in the farm-to-table chain.

All of these controls, regardless of the sector for which they are designed, must be consistent in terms of objective and approach and be based on sound scientific research. To ensure that they yield maximum benefits and utilize resources in the most effective manner possible, however, they must reflect the nature of the process and product regulated, the handling conditions to which the product may be exposed, and the specific risks presented.

With respect to implementation, regulatory resources should focus on verification of production and processing procedures, safety assurance effectiveness, and facility sanitation. Primary responsibility for food safety assurance should fall where it rightly belongs -- on food producers, manufacturers, distributors, retailers, and, yes, even consumers.

Goal #4: Ensure All People in the Farm-to-Table Food Chain are Fully Informed of Food Safety Risks

GMA also endorses the fourth goal of the draft comprehensive strategic plan, namely to ensure that all those who come into contact with food at all levels of production, processing, distribution, and sale, including consumers, understand the potential hazards and know the steps they must take to control them. GMA has consistently cited improvements in education, particularly of consumers, as an essential, underlying principle in any effective food safety system. Where the draft plan falls short, however, is again in its failure to specify what concrete steps the agencies will take to accomplish the stated goal.

To raise awareness of food safety hazards and improve food safety controls, we must first evaluate the level of understanding at each stage in the food chain. Only then can we formulate and refine the information that must be disseminated. Accordingly, the Council's strategic plan with respect to education must start with research to determine what everyone at every stage in the chain knows and does not know about food safety. Based on that learning, the agencies, again with the input of all stakeholders, can develop a "food safety curriculum" that is specifically tailored for each link in the farm-to-table chain, particularly for consumers. This curriculum should help those at each link understand in simple, easy-to-implement terms what concrete, practical steps can and should be taken at that stage to protect against foodborne hazards.

Goal #5: Creation of a Seamless National and International Food Safety System

GMA likewise applauds the Council's decision to designate the creation of a seamless national food safety system as one of the goals of the strategic plan. Again, however, the Council's stated objectives require some refinement.

As an initial matter, it may be helpful for the Council to narrow its focus, at least in the short term, to coordination domestically. The Council, working with the agencies, can then more confidently assert leadership in the international arena. By promoting better cooperation among the food safety agencies within our borders, we send a clear message to our trading partners about the need for global coordination.

It is perplexing that, although the Council calls for ensuring a "complete set of federal statutory authorities for an effective, prevention-based food safety system," as well as efforts to coordinate and integrate federal, state, and local actions, the draft plan is silent on measures now pending in Congress that would bring real improvements in this area. For example, legislation introduced by Senator Roberts this spring would establish national, uniform standards with respect to when foods (other than meat and poultry) would be considered adulterated and, therefore, subject to enforcement action. This measure would substantially boost FDA's effectiveness in enforcing the law's food safety protections, and would enhance the cooperative role of state and local governments in a coordinated nationwide regulatory scheme. State and local officials have an important role to play in enhancing food safety through the cooperative and consistent enforcement of federally adopted requirements.

Finally, GMA urges the agencies to examine critically their listed objectives and identify and incorporate into the strategic plan concrete steps they will take to advance the stated goal. For example, the draft strategic plan calls for "optimizing use of available food safety resources at all levels of government" but is completely silent as to how this will be accomplished. The first step to regulating smart in this area is to pair the considerable knowledge and experience the agencies have developed over time with a national rather than agency-specific outlook.

For example, with respect to inspections, the agencies could develop a single training program for inspectors from all agencies and levels of government, including those at the state and local level, for the enforcement of nationally uniform standards. This type of cross agency, national approach would eliminate duplicative and sometimes conflicting efforts, making regulation more effective with no necessary increase in personnel. Regulatory resources of all types, not simply inspectors, should be allocated and focused on those facilities, processes, and products presenting the most significant food safety hazards based upon risk analysis. Concrete, "resource smart" approaches and measures like these must be considered, discussed, and incorporated into the strategic plan with respect to all of the Council's stated goals.

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#### IV. SUMMARY

GMA welcomes the work of the President's Council in developing a comprehensive food safety plan. A national approach to food safety, founded on the four basic principles of research and science; education; adequate agency resources; and coordination will enhance the safety of food for all Americans. GMA urges the Council to focus on those four principles in formulating the strategic plan.

GMA also strongly urges the Council to make every effort to identify, with specificity, perceived shortcomings of our current system and the measures the agencies can and will take, with the cooperation of industry and consumers, to address them. But again, the focus of this effort should be on real problems and real solutions. Only a strategic plan that includes answers to these difficult yet very basic questions will put the agencies' substantial experience and skills to the most productive use possible and contribute to meaningful enhancements in food safety.

Thank you for your consideration. GMA is eager to continue participating in this most important process.

Sincerely,

A handwritten signature in black ink, appearing to read "Stacey A. Zawel". The signature is fluid and cursive, with the first name "Stacey" and last name "Zawel" clearly distinguishable.

Stacey A. Zawel, Ph.D.  
Vice President, Scientific & Regulatory Policy



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